

United States District Court Ninth Circuit

Plaintiff

Joseph Victor Lagana

v.

Democratic Party, Mark Zuckerberg
Kamala Harris (In Official and Individual Capacity)
Gavin Newsom (In Official and Individual Capacity)
Starbucks
Los Angeles Police Department
Burbank Police Department
Insomniac Events
Pasquale Rotella
Teresa Fierro
Adrian Fierro
Lisa Fierro
State of California
Superior Court of California
Ralph's Market

Cause of Action

U.S.C. 42 § 1985 Conspiracy To Deprive Civil Rights
U.S.C. 42 § 1983 Deprivation Civil Liberties
RICO Act - Racketeering Influenced Corrupt Org
Trebble Damages - Damages to make an example

Factual Background

Lisa Fierro had been arguing with the Plaintiff on or around January 20th - February 2nd. These arguments had become exceedingly heated. She/Lisa Fierro verbally evicted the Plaintiff without proper cause on or around February 2nd 2021. She/Lisa Fierro contacted Burbank Police Department multiple times, Plaintiff needs exact dates and will provide in the next amended complaint.

Teresa Fierro has been manipulative, playing both sides/Plaintiff against Lisa Fierro. She/Teresa Fierro called Burbank Police Department to do a 5150 assessment on the Plaintiff. This is essentially a psych hold to keep Plaintiff off the streets essentially chilling Plaintiff's U.S. Const 1st Amendment / Free speech right and Cal Const, 1st Amendment. Burbank Police Department is also complacent in chilling Plaintiff's Free Speech right.

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Lisa Fierro emptied Plaintiff's bank
account taking roughly \$250 (again this
is just an estimate).

Lisa Fierro's actions give a foundation
to Rico Act cause of action.

Plaintiff is also making claims against
Lisa Fierro for taking \$3,000+ out
of Plaintiff's bank account while he
was in custody. Plaintiff has started
an investigation with his bank, and will
provide further information as it becomes
available. This will further solidify
Plaintiff's Rico Act claim.

On or around February 3rd 2021 Plaintiff
was shopping at Ralph's on Magnolia Blvd
in North Hollywood, CA. 2 unknown
white males grabbed the Plaintiff
from behind while he was searching
for Yogurt. They proceeded to assault
him while Ralph's security was present
and security did nothing. Security
also forcibly removed Plaintiff from
the Ralph's and the security refused to
call 911

Once the Plaintiff was outside the two white males continued their assault, one of them took Plaintiff's ~~cell~~ cell phone (valued at \$1400) and slammed it onto the ground about 5 times. This was done in order to keep the Plaintiff from posting to Facebook, Instagram, and Documenting the continuous stalking and harassment by mostly followers of the Satanic religion and Insomniac Events/Pasquale Rotella. Plaintiff has essentially been blacklisted from ~~the Electronic~~ the Electronic Dance Music scene by Pasquale Rotella and the Democratic Party because of the Plaintiff's political and religious beliefs. Plaintiff has been blocked from using FaceBook 3 times for posting vulgar music, essentially "deplatformed" and forced to use alternative social media, mainly his page at <http://www.instagram.com/realDs>

Starbucks is complicit in Rico Act cause of action because multiple times from 2018 to the present Plaintiff has either been attacked or had police called on him to remove him from the Starbucks.

CDCR or California Department of Corrections is complicit under Rico Act because they placed the Plaintiff into a dangerous situation, homeless without assistance of finding immediate housing assistance.

All Defendants are responsible for conspiring to deprive the Plaintiff of his civil rights and shall be found liable under codes 42 USC § 1983 and 42 USC § 1985.

^{sub} Plaintiff hereby demands a speedy jury trial, in front of a District Court Judge. Plaintiff respectfully declines/refuses to be heard by a magistrate.

Venue and Jurisdiction

The chosen venue is correct because the majority of Defendants do business in or around San Francisco.

Damages & Jury Demand

Plaintiff again demands a speedy jury trial and ask for damage for callous indifference to his free speech rights, even using violent attacks to make the Plaintiff fearful of posting online and make him afraid to be loud and protest in public. Plaintiff claims damages for emotional distress and physical injuries, he also claims monetary damage for monetary loss against all defendants excluding Ralphs. Lastly Plaintiff asks for treble damages to make an example.

Plaintiff ask for damages in the amount of \$308,000,000. This is to make an example of the Defendants.

Associated Cases.

San Francisco Police department committed similar free speech violations giving rise to a lawsuit in U.S. Dist. Ct. case # 4:08-475803

Prayer

Plaintiff hereby submits asking for leave to amend this complaint. Plaintiff prays for judgement in his favor and prays the U.S. Attorney's Office opens an investigation as well.

Joseph V. Lamm 2/6/2021
Respectfully submitted
under penalty of perjury

Joseph Victor Laganza
14850 Roscoe Blvd
Panorama City, CA 91402

(Temporary address)

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FEB 16 2021

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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

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